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July 11, 2010

Rear Admiral James A. Watson
Federal On-Scene Coordinator
United States Coast Guard

Exemption to Dispersant Monitoring and Assessment Directive – Addendum 3

Dear Admiral Watson,

BP respectfully requests an exemption to the Directive's maximum daily application of subsea dispersant for Sunday, July 11, 2010. Consistent with the Capping Stack Installation Plan sent to Admiral Allen on July 9, 2010, we are currently injecting 12 gallons per minute of subsea dispersant into the exiting oil stream. This is to ensure safe working conditions for the +1400 people on vessels working near the source. While we will continue to adjust the dispersant injection rate based upon winds, observed VOCs and oil capture volume, if we maintain 12 gpm, we will exceed 15,000 gallons for July 11.

An increase in subsea dispersant use is consistent with the Guidance on Subsea Dispersant Application you signed on June 23, which states, "For the purpose of VOC control, increases in the application rate of subsurface dispersants will be limited to conditions where winds are weak (< 10 knots) or VOC readings indicate potential health concerns. While this authority is granted to the OSC in the National Contingency Plan, all attempts will be made to maintain the 15,000 gallon per day subsurface cap outlined in Addendum 3 of the Dispersant Monitoring and Assessment Directive." The increase in subsea dispersant is also consistent with the Source Control Subsea Dispersant Forward Plan signed by Doug Suttles on July 6 and awaiting your signature. Assuming a flow rate of 53,000 bbls/day, a capture rate of 8,000 bbls/day, and a dispersant to oil ratio of 75 as stipulated by the USCG and EPA, the target daily dispersant volume would be 25,200 gallons or 17.5 gallons/minute.

The amount of subsea dispersant needed for VOC control has many controlling factors, including oil containment volume, wind conditions, and ocean currents. As you are aware, the amount of oil being captured decreased by ~18,000 barrels yesterday when the previous cap was removed. While we continue to bring the Helix Producer on line as quickly as is safely and operationally prudent, until it is operational, the amount of oil coming to the surface is greater than it has been recently. Additionally, winds are less than 10 knots today and the NOAA forecast is for winds to continue to be light. Finally, while ocean currents are currently bringing the oil to the surface to the southeast of the central operational area, if this current shifts or dissipates, the oil could revert to coming up directly under the main operational area, increasing the risk of VOCs.

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Consistent with all of the above, we are requesting an exemption from the 15,000 gallon limit for July 11, 2010. Unless we see an increase in VOCs, we intend to hold our subsea dispersant rate at approximately 12 gpm, which would result in a total volume for today of less than 20,000 gallons. Further, the Helix Producer should begin capturing oil today, and thus we expect we will only need a one day exemption to proactively prevent dangerous VOC conditions during this time of crucial operations near the source.

Sincerely,

RTF

Douglas J. Suttles

Approval granted subject to the above:



Date: 7-11-10

Rear Admiral James A. Watson
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